

SHER TREMONTE LLP

April 21, 2023

VIA ECF

Hon. Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Trooper 1 v. NYSP et al.*, 22-cv-893 (LDH) (TAM)

Dear Judge Merkl:

On behalf of our client Governor Andrew Cuomo, we write to provide the Court with a proposed Amended Confidentiality Order. As the Court is aware, a confidentiality order was entered in this case on January 5, 2023 (ECF Dkt. No. 60). As the Court is also aware, during the February 7, 2023 argument in the related miscellaneous actions pending before this Court concerning the subpoenas served on the New York State Attorney General (the “OAG”) and the New York State Assembly Judiciary Committee, the OAG indicated that it would produce certain documents if the Confidentiality Order were revised to provide protection to nonparty productions. The additional language, reflected in the attached blackline against the original Confidentiality Order, accomplishes this purpose.

All parties consent to this Amended Confidentiality Order. Further, the OAG agrees that the Amended Confidentiality Order would permit the OAG (and other nonparties) to designate documents as confidential as a producing party.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma

Attachments